

### **REMARKS**

Claims 83-116 are now pending in this application. Claims 1-82 have been canceled. New claims 102-116 have been added. Each of the pending claims is believed to define an invention which is novel and unobvious over the cited references. Favorable reconsideration of this case is respectfully requested.

Claims 83-116 recite a file format for storing a specific type of data. As is known to one of ordinary skill in the art, a file when used in connection with computer systems is an entity of data available to users of the system that can be manipulated as an entity. For example, a file can be moved from computer to computer, directory to directory, transmitted over a network, etc. A file may be, for example, a Word document, which may be attached to an email and transmitted over a network to a recipient. All of the claims of the present application describe what is in the file and the format of the file.

Claims 82 and 100 have been objected to various informalities. Claim 82 has been canceled. Claim 100 has been amended to correct the informality noted by the Examiner. Therefore, the withdrawal of the objection to the claims is respectfully requested.

Claims 28-30, 37-39, 49-56, 58-62, 66-70, 74, 78, 82-92, 99-101 have been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Number 6,718,329 to Selvin et al. Selvin does not anticipate the claimed invention as it does not disclose, among other things, a root storage, a model directory, or a model.

Each of independent claims 83, 99, and 101 recite a root storage, a model directory and a model. Selvin et al. do not disclose any of these elements. Selvin et al. describes a method and apparatus for generating nodes and link definitions for a hypertext database. Selvin et al. has absolutely no relationship whatsoever to a file format, which is what is claimed.

The disclosed link type of Selvin et al. is mapped to the model recited in the claims. A model is a container for holding information. For example, claim 83 explicitly recites that the model includes groups of related element chunks and a model header stream. The link type of

Selvin et al. is a classification of a relationship between two nodes. For example, Selvin et al. defines link definitions 70 as links "defining the internodal association between nodes 60." A link type may be used "to define further desired relationships between linked nodes." Please see column 11, lines 55-59 of Selvin et al. The concept of a link type and a model are simply not related to each other.

Referring to Figures 5-7, for example, in an exemplary embodiment of the invention, each of said plurality of models 310 may comprise element list storages 311, 312 containing at least one element chunk 320. Each of the element chunks may comprise an element chunk header 325 and at least one element 330 that may be associated with its respective element chunk header 325. Within an element list storage (e.g., graphic element list 311 and control element list 312), individual elements may be stored in groupings, or element chunks 320. Each element may be given a unique name, for example so that chunks may be determined merely by iterating over the names in the element list. See, e.g., Specification, page 11, lines 3-8.

Dependent claims 88 and 106 further recite a model directory. A model directory includes a list of the models. The Office Action maps a model directory to the generic phrase "logical or hierarchical relationship" contained in a description of the content of a hypertext document. There is no correspondence between these two items. The parallel between the claimed model directory and the cited portions of Selvin et al. is not apparent. The Examiner is respectfully requested to provide further clarification regarding how a model directory is disclosed in Selvin et al.

Additionally, each of the independent claims recites a root storage. The root storage is a container organized specifically so that it can hold a directory of models. For example, independent claim 83 recites that the root storage includes at least one model. Dependent claim 89 further recites that the root storage further includes a file header stream, a section information stream, a manifest information stream or a file property stream. The Office Action maps the claimed root storage to a "node" in Selvin et al. Selvin et al. explicitly defines a node as a "data structure which contains data and may include fields which specify particular properties or characteristics of the

data." Please see column 4, lines 58-63 of Selvin et al. In no manner is the node described in Selvin et al. the same as equivalent, or substitutable for the claimed root storage.

Additionally, claim 101 is specifically directed to a CAD design file having a file format. The only mention of a CAD file in Selvin et al. is that a CAD program can be used to generate a source document. Please see column 4, lines 19-34 of Selvin et al. There is no disclosure anywhere within Selvin et al. of the particular format of a CAD file.

In view of the above, it is clear that the cited reference fails to teach or disclose each and every element recited in the rejected claims as is required by 35 U.S.C. 102. Therefore, the withdrawal of this rejection is respectfully requested.

Claims 31-32, 40, 43-45, 48, 57, 63, 71, 79, 93 and 94 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Selvin et al. in view of Shiba et al.

Claims 93 and 94 depend from independent claim 83 and are patentable for at least the reasons discussed above regarding claim 83. Shiba et al. does not supplement Selvin et al. to teach or suggest the claimed invention. The remaining rejected claims has been canceled. Therefore, the withdrawal of this rejection is respectfully requested.

Claims 33-34, 41, 64, 72, 80, 95-96 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Selvin et al. in view of Loveland et al. Claims 95-96 depend from independent claim 83 and are patentable for at least the reasons discussed above regarding claim 83. The remaining rejected claims have been canceled. Therefore, the withdrawal of this rejection is respectfully requested.

Claims 35-36, 42, 46-47, 65, 73, 81, 97-98 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Selvin et al. in view Shiba et al. further in Loveland et al. Claims 97-98 depend from independent claim 83 and are patentable for at least the reasons discussed above regarding claim 83. Shiba and Loveland do not supplement Selvin et al. to teach or suggest the

claimed invention. The remaining rejected claims have been canceled. Therefore the withdrawal of this rejection is respectfully requested.

If the Examiner is of the opinion that the prosecution of this application would be advanced by a personal interview, the Examiner is invited to telephone undersigned counsel to arrange for such an interview.

The Commissioner is authorized to charge any fee necessitated by this Amendment to our Deposit Account No. 22-0261.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

By 

Jeffri A. Kaminski

Registration No.: 42,709

James R. Burdett

Registration No.: 31,594

VENABLE LLP

P.O. Box 34385

Washington, DC 20043-9998

(202) 344-4000

(202) 344-8300 (Fax)

Attorney/Agent For Applicant